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January 10, 2024

**VIA ECF**

The Honorable Gregory H. Woods  
 United States District Judge  
 Southern District of New York  
 Daniel Patrick Moynihan U.S. Courthouse  
 500 Pearl St., Room 2260  
 New York, NY 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 1/11/2024
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**MEMORANDUM ENDORSED**

Re: *Lokman v. Azure Power Global Limited et al.*, Case No. 1:22-cv-07432-GHW

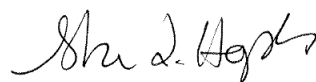
Dear Judge Woods:

We represent lead plaintiff Serap Lokman ("Plaintiff") and the putative class in the above-referenced matter. We write pursuant to Your Honor's Individual Rules of Practice in Civil Cases, Rule 1.E., Requests for Adjournments or Extensions of Time, to request that the Court adjourn the hearing on Defendants' Letter Motion for Conference currently set for January 18, 2024 at 4:15 p.m. (ECF 92) and reschedule the conference at a date and time after January 24, 2024, the date Plaintiff's response to Defendants' Letter Motions is due.

On December 2, 2023, the Court granted Defendants' first request for an extension of time to file a response to Plaintiff's Second Amended Complaint ("SAC"). ECF 85. The Court's Order set the deadline for Defendants to respond to the SAC for January 5, 2024, and the deadline for Plaintiff to respond to Defendants' submission for January 24, 2024. *Id.* On January 5, 2024, Defendants submitted *three* separate letters requesting a pre-motion conference on their anticipated motions to dismiss. ECFs 88-91.

On January 9, 2024, the Court entered an order granting Defendants' Letter Motions for a pre-motion conference and setting a teleconference regarding Defendants' proposed motions to dismiss for January 18, 2024 at 4:15 p.m. ECF 92. However, Plaintiff's response to Defendants' pre-motion letters is not due until January 24, 2024. Accordingly, Plaintiff will not have had an opportunity to submit a response prior to the January 18 conference. Plaintiff, therefore, respectfully requests that the Court adjourn the January 18, 2024 conference and set a conference at least two business days after Plaintiff submits her response in order to give Plaintiff an opportunity to respond to Defendants' letter motions and ample time to prepare for the conference. This is Plaintiff's first request and Defendants take no position.

Respectfully submitted,



Shannon L. Hopkins

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LEVI & KORSINSKY LLP  
*Attorneys for Plaintiff*

cc: All counsel of record via ECF

Application granted. Plaintiff's request to adjourn the pre-motion conference scheduled for January 18, 2024 is granted. Dkt. No. 93. Under Rule 2.E.i of the Court's Individual Rules of Practice in Civil Cases, an opposing party must submit a letter setting forth its position within five days of a request for a pre-motion conference not concerning discovery. The deadlines specified in the Court's December 2, 2023 order are for an anticipated answer or other response to the complaint, which are mooted by the filing of a request for pre-motion conference, at which the Court expects to set a briefing schedule for a motion to dismiss, if any. Given the confusion, however, the Court will extend the time for Plaintiff's letter response, if any, to Defendants' January 5, 2024 letter to January 18, 2024. The pre-motion conference scheduled for January 18, 2024 is adjourned to February 6, 2024 at 2:00 p.m.

SO ORDERED.

Dated: January 11, 2024  
New York, New York

  
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GREGORY H. WOODS  
United States District Judge